

NEAL & HARWELL, PLC

LAW OFFICES
150 FOURTH AVENUE NORTH
SUITE 2000

NASHVILLE, TENNESSEE 37203-2498

TELEPHONE
(615) 244-1713

FACSIMILE
(615) 726-0573

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JAMES F. NEAL
AUBREY B. HARWELL, JR.
JON D. ROSS
JAMES F. SANDERS
THOMAS H. DUNDON
RONALD G. HARRIS
ALBERT F. MOORE
PHILIP N. ELBERT
JAMES G. THOMAS
WILLIAM T. RAMSEY
JAMES R. KELLEY
MARC T. MCNAMEE
GEORGE H. CATE, III
PHILIP D. IRWIN
A. SCOTT ROSS
GERALD D. NEENAN

AUBREY B. HARWELL, III
W. DAVID BRIDGERS
KENDRA E. SAMSON
MARK P. CHALOS
DAVID G. THOMPSON
CYNTHIA S. PARSON
KELTIE L. HAYS
CHRISTOPHER D. BOOTH
RUSSELL G. ADKINS
ELIZABETH S. TIPPING

OF COUNSEL
JOHN D. CLARKE

July 30, 2004

VIA HAND DELIVERY

Sharla Dillon, Docket Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: Coalition of Small Lec's
Docket Nos 03-00585

Dear Ms Dillon:

Per our phone conversations this morning, enclosed is an original and fifteen copies of the Response of the Rural Independent Coalition of Small LECs and Cooperatives to the First Set of Interrogatories of the CMRS Providers, along with a Notice of Filing regarding same.

Thank you for your assistance.

Sincerely,



Sarah Martin McConnell
Paralegal

/jm
enclosures

cc: All Counsel of Record

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
Petition of Cellco Partnership d/b/a Verizon Wireless)	Consolidated
for Arbitration under the Telecommunications Act)	Docket No. 03-00585
of 1996		

NOTICE OF FILING

The Tennessee Rural Independent Coalition, by counsel, submits the attached, RESPONSE OF THE RURAL COALITION OF SMALL LECs AND COOPERATIVES TO THE FIRST SET OF INTERROGATORIES OF THE CMRS PROVIDERS, for filing herewith, and which interrogatory responses were served to the parties of record via electronic mail and U.S. Mail on March 29, 2004 as evidenced by the Certificate of Service attached thereto.

Respectfully submitted,

NEAL & HARWELL, PLC

By: William T. Ramsey
William T. Ramsey, #9245
2000 One Nashville Place
150 Fourth Avenue North
Nashville, Tennessee 37219
(615) 244-1713

KRASKIN, LESSE & COSSON, LLC

By: Stephen G. Kraskin (by WTR)
Stephen G. Kraskin
2120 L St. N.W., Suite 520
Washington, D.C. 20037
**Counsel for The Tennessee Rural Independent
Coalition**

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on 7/30, 2004, a true and correct copy of the foregoing was served on the parties of record via first-class mail and electronic mail:

Russ Mitten, Esq.
Citizens Communications
3 High Ridge Park
Stamford, Connecticut 06905
Rmitten@czn.com

Henry Walker, Esq.
Boult, Cummings, et al.
PO Box 198062
Nashville, TN 37219-8062
hwalker@boultcummings.com

Jon E. Hastings, Esq.
Boult, Cummings, et al.
PO Box 198062
Nashville, TN 37219-8062
jhastings@boultcummings.com

James Wright, Esq.
Sprint
14111 Capitol Blvd.
NCWKFR0313
Wake Forest, North Carolina 27587
James.wright@mail.sprint.com

J. Gray Sasser, Esq.
Miller & Martin
1200 One Nashville Place
150 Fourth Avenue North
Nashville, TN 37219
gsasser@millermartin.com

James Lamoureux, Esq.
AT&T
1200 Peachtree St. N.E.
Atlanta, Ga. 30309
Lamoureux@att.com

Donald L. Scholes
Branstetter, Kilgore, et al.
227 Second Ave. N.
Nashville, TN 37219
dscholes@branstetterlaw.com

Timothy Phillips, Esq.
Office of the Tennessee Attorney General
PO Box 20207
Nashville, TN 37202
Timothy.Phillips@state.tn.us

Guy M. Hicks, Esq.
Joelle Phillips, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300
Joelle.Phillips@bellsouth.com

Elaine Critides, Esq.
John T. Scott, Esq.
Charon Phillips, Esq.
Verizon Wireless
1300 I Street N.W.
Suite 400 West
Washington, D.C. 20005
elaine.critides@verizonwireless.com

Paul Walters, Jr., Esq.
15 East 1st Street
Edmond, OK 73034
pwalters@sbcglobal.net

Suzanne Toller, Esq.
Davis Wright Temaine
One Embarcadero Center #600
San Francisco, Calif. 94111-3611
suzannetoller@dwt.com

Beth K. Fujimoto, Esq.
AT&T Wireless Services, Inc.
7277 164th Ave., N.E.
Redmond, WA 90852
Beth.fujimoto@attws.com

Monica M. Barone, Esq.
Sprint
6450 Sprint Parkway
Overland Park, KS 66251
mbaron02@sprintspectrum.com

Mr. Tom Sams
Cleartalk
1600 Ute Ave
Grand Junction, CO 81501
toms@cleartalk.net

Dan Menser, Esq.
Marin Fettman, Esq.
c/o T Mobile USA, Inc.
12920 SE 38th St.
Bellevue, WA 98006
dan.menser@t-mobile.com

Mark J. Ashby
Cingular Wireless
5565 Glenridge Connector
Suite 1700
Atlanta, GA 30342
Mark.ashby@cingular.com

Stephen G. Kraskin, Esq.
Kraskin, Lesse & Cosson, LLP
2120 L Street NW, Suite 520
Washington, DC 20037
skraskin@klctele.com

Joe Chiarelli
Sprint
6450 Sprint Parkway, 2nd Fl.
Mail Stop KSOPHN0212 2A568
Overland Park, KS 66251
jchiar01@sprintspectrum.com

Bill Brown
Senior Interconnection Manager
Cingular Wireless
5565 Glenridge Connector, Suite 1534D
Atlanta, GA 30342
bill.brown@cingular.com

Dan Menser
Sr. Corporate Counsel
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
dan.menser@t-mobile.com

Greg Tedesco
T-Mobile USA, Inc.
2380 Bisso Lane, Suite 256
Concord, CA 94520-4821
greg.tedesco@t-mobile.com

Gary Sanchez, Associate Director-
State Regulatory Relations
Cingular Wireless
5565 Glenridge Connector Ste. 1710
Atlanta, GA 30342
gary.sanchez@cingular.com

Marc Sterling
Verizon Wireless
One Verizon Place
Alpharetta, GA 30004
Marc.Sterling@VerizonWireless.com

Melvin J. Malone
Miller & Martin PLLC
1200 One Nashville Place
150 Fourth Avenue North
Nashville, TN 37219
mmalone@millermartin.com

Mark Felton
SPRINT
6450 Sprint Parkway
Mail Stop KSOPHN0212 – 2A472
Overland Park, KS 66251
mark.g.felton@mail.com

Laura Gallagher, Esq.
Drinker Biddle & Reath LLP
1500 K Street, NW
Washington, DC 20005
laura.Gallagher@dbr.com

William J Ramsey

BEFORE THE
TENNESSEE REGULATORY AUTHORITY

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IN RE:

Generic Docket Addressing Rural Universal Service)	Docket No. 00-00523
)	
Petition of Cellco Partnership d/b/a Verizon Wireless)	Docket No. 03-00585
for Arbitration under the Telecommunications Act)	

RESPONSE OF THE RURAL COALITION OF SMALL LECs
AND COOPERATIVES TO THE FIRST SET OF INTERROGATORIES OF THE CMRS
PROVIDERS

on behalf of

Ardmore Telephone Company, Inc.
Ben Lomand Rural Telephone Cooperative, Inc.
Bledsoe Telephone Cooperative
CenturyTel of Adamsville, Inc.
CenturyTel of Claiborne, Inc.
CenturyTel of Ooltewah-Collegedale, Inc.
Concord Telephone Exchange, Inc.
Crockett Telephone Company, Inc.
DeKalb Telephone Cooperative, Inc.
Highland Telephone Cooperative, Inc.
Humphreys County Telephone Company
Loretto Telephone Company, Inc.
Millington Telephone Company, Inc.
North Central Telephone Cooperative, Inc.
Peoples Telephone Company
Tellico Telephone Company, Inc.
Tennessee Telephone Company
Twin Lakes Telephone Cooperative Corporation
United Telephone Company
West Tennessee Telephone Company, Inc.
Yorkville Telephone Cooperative

"The Coalition of Small LECs and Cooperatives"

RESPONSES TO INTERROGATORIES

The Rural Independent Coalition (hereafter referred to as the "Coalition" or the "Independents") respond to the CMRS Providers' First Set of Interrogatories as follows:

OBJECTIONS

1. The Coalition objects to each and every interrogatory and request for production to the extent that it requests information or documents protected by the attorney-client privilege, as such information and documents are not discoverable.

2. The Coalition objects to each and every interrogatory and request for production to the extent that it requests information or documents protected by the attorney work product doctrine, as such information and documents are not discoverable.

3. The Coalition objects to each and every interrogatory and request for production to the extent that it requests information and documents that are not relevant to the issues before the Tennessee Regulatory Authority.

4. Discovery is ongoing and the Coalition reserves the right to supplement each interrogatory and request for production if additional information is discovered.

I. EXISTING ARRANGEMENTS

A. Written Agreements

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such

agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Coalition Response I-1: See Attachment A.

I-2. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists that has not been filed with the TRA, please provide a copy of such agreement, as well as all amendments thereto.

Coalition Response I-2: Coalition members do not have agreements for the exchange of Telecommunications Traffic that are not filed with the TRA. Traffic that originates or terminates on the network of a Coalition member may be eligible to be treated as "Telecommunications Traffic," as that term is used in 47 CFR § 51.701(b) of the Subpart H Reciprocal Compensation Rules of the Federal Communications Commission ("FCC"). Any such traffic, however, is not treated as subject to these rules in the absence of a request for interconnection pursuant to Section 251(b)(5) of the Communications Act (47 USC § 251(b)(5).) For example, the CMRS Providers currently transmit traffic that originates and terminates within the MTA to Coalition members. Although this traffic may be eligible to be treated as "Telecommunications Traffic," the CMRS Providers have elected to transmit this traffic pursuant to an indirect interconnection arrangement via BellSouth. Consequently, the traffic is not currently subject to any agreement that addresses the treatment of "Telecommunications Traffic" under the FCC's Rules.

B. Unwritten Agreements

I-3. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have

terminated any Telecommunications Traffic either directly or indirectly during the past 12 months without the benefit of a written agreement.

Coalition Response I-3: See Response I-2.

I-4. For each Telecommunications carrier identified in response to Interrogatory I-3, please identify whether the traffic is being originated or terminated based upon agreed terms and, if so, please identify any agreed upon rate for the termination and/or transport of such traffic, traffic ratio(s) and (if the Telecommunications carrier is a CMRS carrier) interMTA factor(s).

Coalition Response I-4: See Response I-2.

C. Affiliates

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Coalition Response I-5: See Attachment A.

D. Bill and Keep Agreements

I-6. Provide the names of all Telecommunications carriers with which you currently exchange any traffic on a bill and keep basis.

- a. Describe the traffic subject to such agreement.
- b. Describe how the traffic subject to bill and keep is routed and rated.

Coalition Response I-6: The Coalition assumes that the reference to “bill and keep” is to that term as it is used in 47 USC § 252(d)(2)(B)(i). The Coalition Members do not have “bill and keep” arrangements.

II. BASIS FOR TRANSPORT AND TERMINATION RATES

I-7. For each transport rate, termination rate and interconnection facility rate that may be contained in an agreement identified in response to Interrogatories I-1 (written agreements filed with the TRA), I-2 (written but unfiled agreements) and/or I-3 (unwritten agreements), please describe how the rate, and each of its elements, is calculated.

Coalition Response I-7: The rates set forth in all such agreements were established through voluntary negotiation between the parties.

I-8. For each transport rate, termination rate and interconnection facility rate described in response to Interrogatory I-6, please state whether you contend that the rate is based on the forward-looking economic cost for you to provide such transport, termination, and interconnection facility, and provide a copy of each and every cost study, including all supporting documentation relating to establishment of such rates.

Coalition Response I-8: See Coalition Response I-7.

I-9. What are the respective rates that each Respondent proposes for transport and termination of (a) Telecommunications Traffic exchanged on a direct basis with the CMRS Providers and (b) Telecommunications Traffic exchanged on an indirect basis with the CMRS Providers?

Coalition Response I-9: The Coalition Members have not proposed rates for the transport and termination of “Telecommunications Traffic.” In accordance with the applicable FCC rules, the establishment of a rate requires the establishment of an “interconnection point between the two carriers.” (47 CFR §51.701(c)). Neither in the collective negotiations that preceded the filing of the arbitration petitions, nor in the arbitration petitions has any CMRS Provider requested the establishment of an interconnection point on the network of any Coalition Member.

I-10. For each rate provided in response to Interrogatory I-8 (regarding rates proposed for the transportation and termination of Telecommunications Traffic exchanged with the CMRS Providers), please describe how the rate, and each of its elements, is calculated. Please include in your answer identification of each distinct network function that you contend is required to provide each termination arrangement.

Coalition Response I-10. See Coalition Response I-9.

I-11. For each rate provided in response to Interrogatory I-8 (regarding rates proposed for the transportation and termination of Telecommunications Traffic exchanged with the CMRS Providers), please identify and provide copies of all cost models, cost inputs, and cost assumptions relating to the rate, projected traffic demand and growth assumptions, including all supporting documentation of any network functionality that you use to terminate a call originated by the CMRS Providers. Please include in your response functioning electronic copies of the cost models, populated with the inputs and assumptions used by Respondent, in a format that allows the user to change inputs and assumptions and recalculate results.

Coalition Response I-11. See Coalition Response I-9.

I-12. Have any of the rates that you propose for transport and termination of Telecommunications Traffic exchanged with the CMRS Providers been approved by the TRA? If so, please identify the decision and provide a copy.

Coalition Response I-12. See Coalition Response I-9. In the course of the collective negotiations, the Coalition Members did offer rates subject to voluntary negotiation of the indirect interconnection issues that are not the subject of any statute or regulation. A compromise indirect interconnection rate of 3 cents per minute was approved by Order of the Hearing Officer issued May 5, 2003 in Docket No. 00-00523.

III. FACILITIES AND TRANSIT COSTS

A. Combined Traffic Delivered Over Same Trunk Group

I-13. Please identify where (i.e., physical interconnection location(s)) and how (i.e. type of trunk group, and nature of traffic currently exchanged over each trunk group) Respondent's network is currently interconnected with the BellSouth network.

Coalition Response I-13. Each company is generally connected to a BellSouth switch utilizing FGC type trunks as common trunks. All toll and carrier traffic, including that of other interexchange carriers, CLECs and CMRS providers traverses these trunks, unless a carrier has a direct trunk group to the carrier or BellSouth has established an end office to end office connection. The v & h coordinates of the points of interconnection are set forth in NECA Tariff 4. When traffic between a Coalition Member's exchange and a BellSouth exchange is deemed to be within the same calling scope by applicable regulation or tariff, Bellsouth and the Independent establish an EAS trunk group. Between BellSouth and each Independent there generally exist operator trunk groups, alarm trunks and test trunk groups.

I-14. Do you contend that you need to install any additional facilities or augment any existing facilities in order to provide direct or indirect connection to the CMRS Providers pursuant to the interconnection agreement that is the subject of this proceeding? If so, please describe in detail the additional and augmented facilities and state why they are necessary.

Coalition Response I-14. Each Coalition Member cannot determine whether any additional facilities or augmentation of existing facilities is required to provide a direct interconnection to a CMRS provider until the CMRS provider requests a point of interconnection on the Independent's network and negotiates direct interconnection with specificity. No additional facilities are required to continue the existing indirect interconnection arrangement through

BellSouth under the existing terms and conditions applicable to the interconnection of BellSouth to each Independent. If these terms and conditions are changed, additional facilities may be required to ensure that each of the issues raised by the Coalition in response to the arbitrations is equitably addressed. In the absence of defined new terms and conditions, it is not possible to identify the additional facilities that will be required to address these issues.

I-15. Does BellSouth currently combine CMRS Provider traffic with other traffic types and deliver such combined traffic to you over the same trunk group(s)? If so, please identify each trunk group over which combined traffic is delivered to you by BellSouth, and each type of traffic that you contend BellSouth has combined for delivery over that trunk group.

Coalition Response I-15. This Interrogatory should be directed to BellSouth. BellSouth has uniquely been permitted to maintain feature group C common trunk groups to the Independents. Traffic through these trunk groups does not provide an indicator of the originating carrier identification. Consequently, the Independents cannot identify the nature of the traffic terminating on their networks through these trunks.

I-16. For each type of traffic that BellSouth delivers to you, please state what call detail information BellSouth provides to you, if any, that identifies such traffic by traffic type, message quantity, call duration, or originating party.

Coalition Response I-16. Bell provides Carrier Access Billing Records in the standard EMI for all IXC traffic in a FGD 1101 record format. For CMRS calls we receive non-standard records because the OCN field is used to identify the originating entity for CMRS companies that have a purported “meet point billing” arrangement with BellSouth. With respect to other CMRS traffic (that which the CMRS Providers and BellSouth call “non-meet-point billed”), no records are provided.

I-17. Do you currently bill inter-exchange carriers (IXCs) for either originating or terminating minutes of use? If so, please describe what call detail information is provided to you by BellSouth and/or the IXCs, if any, which you in turn use to bill the IXC(s)? Is the IXC traffic combined with other traffic?

Coalition Response I-17. Originating and terminating access is billed to IXCs for all minutes of use. When an Independent records originating traffic, originating switch records are used based on the customer's presubscribed carrier. If an Independent subtends a BellSouth tandem, the Independent uses BellSouth terminating billing records to bill IXCs unless the IXC has deployed direct trunks to the Independent's end office. Standard industry EMI (Exchange Message Interface) records are transmitted to the Independent pursuant to agreement and in accordance with the guidelines set forth in the ATIS/OBF-EMI Industry Support Interface manual. Those companies that subtend a BellSouth tandem receive a record description for Carrier Access Usage (Category 11) Group 01 (North American Originated and Terminated) record type 01 denoting Message Telephone Service. This record is used to report Access Minutes of use for Message Telephone Service and subsequent billing of access by the Independent.

B. Shared Facility Costs

I-18. Does Respondent agree that it is obligated to share with the CMRS Providers the cost of the facilities used for direct interconnection between the CMRS Providers and Respondent? If so, please describe in detail your proposal for the sharing of the cost of the facilities? If not, explain the legal basis for your position.

Coalition Response I-18. This interrogatory addresses "direct" interconnection which was not the subject of the collective negotiations. The specific facts regarding transport facilities will vary dependent upon the specific circumstances of specific negotiations between two carriers

establishing a direct interconnection arrangement. Within the framework of a negotiation, the terms applicable to the establishment of transport facilities would be subject to voluntary negotiation. In the absence of a specific direct interconnection request and the establishment of a proposed point of interconnection, it is not possible to address a proposal to share costs.

I-19. Does Respondent agree to share with BellSouth the cost of the facilities used for indirect interconnection between the CMRS Providers and Respondent? If so, please describe in detail your proposal for the sharing of the cost of the facilities?

Coalition Response I-19. The Independents have no obligation to incur any costs to transport traffic beyond their respective network borders.

I-20. If a CMRS Provider orders an interconnection facility that directly connects a Respondent switch to the CMRS Provider's switch located outside Respondent's geographic service area boundary, does Respondent contend that it is relieved of the responsibility to share the cost associated with the portion of the interconnection facility that extends beyond Respondent's exchange boundary? If so, please identify the authority that relieves Respondent of such cost sharing responsibility.

Coalition Response I-20. There is no law or regulation that requires any Independent to assume costs for the transport of traffic beyond its network borders.

C. Transit Costs

I-21. Does Respondent contend that there is any FCC Rule or other authority which requires transit charges associated with the delivery of land- originated Telecommunications traffic sent through a third-party tandem to be paid by the terminating CMRS provider? If so, please identify the rule(s) or other authority.

Coalition Response I-21. There are no rules, regulations or standards that address indirect interconnection of a CMRS provider to a rural incumbent LEC. No rules, regulations or standards exist that require a rural incumbent LEC to transmit traffic to a CMRS provider through an indirect interconnection arrangement established by the CMRS provider.

IV. TRAFFIC RATIOS

I-22. What is the approximate ratio of (a) Telecommunications Traffic originated by your landline customers and delivered to each of the CMRS Providers (land-to-mobile) to (b) Telecommunications Traffic that each of the CMRS Providers respectively originates to you (mobile-to-land)?

Coalition Response I-22. The Coalition assumes that the intent of this question is to refer to the traffic that is the subject of the arbitrations. The Coalition members cannot determine the ratios of traffic that is transmitted pursuant to the existing indirect arrangement through BellSouth. (See Coalition Response I-15). BellSouth should be able to provide and verify this information directly.

I-23. With respect to any traffic ratio identified in Interrogatory I-20, please provide all supporting data, including but not limited to traffic studies, traffic reports, and any other documentation which supports that traffic ratio.

Coalition Response I-23. See Coalition Response I-22.

V. ROUTING AND DIALING PARITY

I-24. Is Respondent currently sending any Telecommunications Traffic originated by its landline customers to any of the CMRS Providers through trunk groups which connect Respondent to BellSouth tandem facilities? If so, please state the monthly volume of that Telecommunications traffic.

Coalition Response I-24. No. See Coalition Response I-2. The traffic that is the subject of the arbitrations (i.e., traffic not subject to an established interconnection agreement pursuant to 47 USC § 251(b)(5)) is not transmitted pursuant to a request to treat the traffic as “Telecommunications Traffic” under the FCC’s Rules.

I-25. If Respondent is currently sending any Telecommunications Traffic originated by its landline customers to any of the CMRS Providers through trunk groups which connect Respondent to BellSouth’s tandem facilities, to what extent is that traffic dialed by Respondent’s landline customers on a non-toll, 7 or 10 digit basis?

Coalition Response I-25. See Coalition Responses I-2 and I-24. The Independents may have the right to request that traffic originated on their respective networks be treated as “Telecommunications Traffic” subject to 47 USC § 251(b)(5), but in the absence of a request, the traffic is not Section 251(b)(5) traffic.

I-26. Excluding the CMRS Providers, does Respondent send any Telecommunications Traffic originated by its landline customers to any other Telecommunications carrier, or terminate Telecommunications Traffic from any other Telecommunications carrier, through trunk groups which connect Respondent to BellSouth tandem facilities? If so, please identify each Telecommunications carrier, and state to what extent traffic originated by Respondent’s landline customers to such Telecommunications carrier may be dialed on a non-toll, 7 or 10 digit basis.

Coalition Response I-26. The only traffic relevant to this interrogatory would be that traffic interconnected pursuant to the interconnection agreements identified in Attachment A. In

general, traffic transmitted under those agreements would not be “toll” traffic. “Toll” traffic is handled by an end user customer’s chosen toll carrier.

I-27. Please describe how Respondent determines whether a call originated by one of Respondent’s landline customers to a CMRS carrier’s NPA-NXX should be sent as either a) a non-toll 7 digit dialed call, b) a non-toll 10 digit dialed call, or c) a 1+ toll call.

Coalition Response I-27. The determination of whether a call is 1+ is made on the basis of whether the call will be subjected to interexchange service toll charges. The use of 7 digit versus 10 digit dialing of non-toll calls is a matter of the dialing pattern required in a particular geographic area. The determination of how a LEC treats a CMRS call is dependent on many factors including the terms and conditions that would apply to the completion of the call, potential costs of transport, and any and all other costs associated with completion of the call. Throughout the collective negotiations, and evident in the arbitration petitions, the CMRS providers appear to ignore the fact that the Independents have the same right to termination on their networks under the Communications Act and applicable rules, as the CMRS providers have to terminate traffic on the networks of the Independents. No statute or rule requires either a CMRS Provider or an Independent to transmit traffic through an arrangement established under 47 USC § 251(b)(5). When a LEC transmits traffic to a CMRS provider under such an arrangement and incurs expenses to complete the call, the FCC has made clear the fact that the LEC may assess charges to its customers.

I-28. Please identify whether or not Respondent provides calling from its landlines to CMRS NPA-NXXs rated in rate centers that are within Respondent’s local calling area on a non-toll basis. Please describe how such calls are routed.

Coalition Response I-28. The local calling scopes of the Independents are defined geographical areas established and described in the applicable tariff of each Independent. Calls with a LEC “local calling area” are calls that originate and terminate within the geographic area. When calls within a “local calling area” involve more than a single carrier, the carriers generally establish extended area service (“EAS”) trunks and calls originated and terminated within the geographically defined local calling area may be routed through the EAS trunk. The obvious and most fundamental aspect of CMRS is the fact that the service is mobile. Accordingly, and irrespective of any purported association with a “rate center,” an NPA-NXX assigned to a CMRS provider is not associated with any static geographical area. As a matter of choice, a LEC may elect to treat calls to a particular CMRS provider’s NPA-NXX as “non-toll.” The choice may depend on consideration of numerous factors (see, e.g., Coalition Response I-27). As the CMRS providers are aware, the attempt of CMRS providers to require LECs to route and rate calls in a manner dictated by the CMRS providers is pending in FCC Docket 01-92.

I-29. Please identify whether or not Respondent provides calling from its landlines to CMRS NPA-NXXs rated in rate centers that are Metropolitan Area Calling (“MAC”) plan or Extended Area Service (“EAS”) rate centers on a non-toll basis. Please describe how such calls are routed.

Coalition Response I-29. An Independent may route such traffic through BellSouth common trunk groups or EAS trunks under circumstances where it may not be aware that the traffic is terminated on a CMRS network. For example, such circumstances would arise if the CMRS provider had type 1 interconnection with a LEC whereby it had obtained NPA-NXXs that are generally assigned to landline service customers in the MAC or EAS area.

VI. SWITCH INFORMATION

I-30. Identify all switches owned by you, the wire center location and CLLI codes in which each switch is located, the number of switched residential, business, and public lines served by each switch, and the number of non-switched (e.g., special access, dedicated circuits, etc.) served out of each wire center belonging to you.

Coalition Response I-30. See Attachment A. The Coalition objects to provision of information regarding the number and type of lines served by each switch as such information is irrelevant to the issues regarding the indirect interconnection addressed by the collective negotiations and the arbitration petitions.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Coalition Response I-31. See Attachment A regarding the identification of switches. BellSouth should not serve as a tandem for traffic to an Independent that has its own tandem. The inquiry regarding how traffic through the BellSouth tandem is handled, and the cost of facilities from the BellSouth tandem to each Independent's network should be directed to BellSouth.

I-32. For each ICO tandem or end office switch you own, describe in detail how traffic from your customers is delivered to the customers' IXC(s), and describe all arrangements related to the cost of the facilities used to carry this traffic.

Coalition Response I-32. These arrangements and the costs of using these arrangements are defined in the publicly-filed and available intrastate and interstate access tariffs of each Independent. The CMRS providers may elect to order services pursuant to these tariffs.

I-33. Identify all of your tandem or end office switches connected to a BellSouth tandem with two-way Feature Group C trunks.

Coalition Response I-33. The subtending arrangements for access services offered by each Independent are set forth in NECA Tariff # 4.

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Coalition Response I-34. The switches are identified in Attachment A. The subtending arrangements of each Independent are set forth in NECA Tariff # 4.

VII. MISCELLANEOUS

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Coalition Response I-35. See Attachment A.

I-36. Does Respondent contend there is any FCC Rule or other authority that excludes the reciprocal compensation requirements of 47 U.S.C. § 251(b) (5) from applying to land-originated Telecommunications Traffic that is delivered to a CMRS carrier via an intra-lata toll or IXC? If so, please identify each FCC rule or other authority that provides such an exclusion.

Coalition Response I-36. See Coalition Response I-2. When a LEC does not choose to send traffic to a CMRS provider pursuant to an agreement under 47 U.S.C. § 251(b) (5), the carrier of the traffic to the CMRS provider may be the originating

customer's intraLATA or interLATA toll provider. Under these circumstances, the LEC provides originating access service to the toll provider in accordance with 47 U.S.C. § 251(g), and the toll provider (not the LEC) delivers the call to the CMRS network. In this proceeding, 47 U.S.C. § 251(b) (5) is not applicable because the CMRS Providers have not elected to establish "interconnection point between the two carriers." (47 CFR §51.701(c)). (See Coalition Response I-9.)

I-37. Provide copies of your audited financial statements for 2000, 2001, 2002 and 2003.

Coalition Response I-37. The Coalition objects to this request as not seeking documents or information relevant to the issues before the Tennessee Regulatory Authority in the arbitration.

I-38. Provide a copy of your most recent access rate cost study.

Coalition Response I-38. The Coalition objects to this request. Any such studies, if they exist, are irrelevant to the issues in this arbitration.

Respectfully submitted,

NEAL & HARWELL, PLC

By: William T. Ramsey
William T. Ramsey

2000 One Nashville Place
150 Fourth Avenue North
Nashville, Tennessee 37219
(615) 244-1713 Telephone
(615) 726-0573 Facsimile

KRASKIN, LESSE & COSSON, LLC

By: Stephen G. Kraskin
Stephen G. Kraskin

Kraskin, Lesse & Cosson LLC
2120 L St N.W. Suite 520
Washington, D.C. 20037

Counsel for The Tennessee Rural Independent Coalition

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing has been served on the parties of record indicated below via U.S. Mail and via electronic mail on this the 29th day of March, 2004.

William J. Ramsey

Russ Minton, Esq.
Citizens Communications
3 High Ridge Park
Stamford, Connecticut 06905

Henry Walker, Esq.
Boult, Cummings, et al.
PO Box 198062
Nashville, TN 37219-8062

Jon E. Hastings, Esq.
Boult, Cummings, et al.
PO Box 198062
Nashville, TN 37219-8062

James Wright, Esq.
Sprint
14111 Capitol Blvd.
NCWKFR0313
Wake Forest, North Carolina 27587

J. Gray Sasser
J. Barclay Phillips, Esq.
Dan Elrod, Esq.
Miller & Martin
1200 One Nashville Place
150 Fourth Avenue North
Nashville, TN 37219

James Lamoureux, Esq.
AT&T
1200 Peachtree St. N.E.
Atlanta, Ga. 30309

Certificate of Service, Page 2

Donald L. Scholes
Branstetter, Kilgore, et al.
227 Second Ave. N.
Nashville, TN 37219

Timothy Phillips, Esq.
Office of the Tennessee Attorney General
PO Box 20207
Nashville, TN 37202

Guy M. Hicks, Esq.
Joelle Phillips, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

Elaine Critides, Esq.
John T. Scott, Esq.
Charon Phillips, Esq.
Verizon Wireless
1300 I Street N.W.
Suite 400 West
Washington, D.C. 20005

Paul Walters, Jr., Esq.
15 East 1st Street
Edmond, OK 73034

Suzanne Toller, Esq.
Davis Wright Temaine
One Embarcadero Center #600
San Francisco, Calif. 94111-3611

Beth K. Fujimoto, Esq.
AT&T Wireless Services, Inc.
7277 164th Ave., N.E.
Redmond, WA 90852

Monica M. Barone, Esq.
Sprint
6450 Sprint Parkway
Overland Park, KS 66251

Certificate of Service, Page 3

Mr. Tom Sams
Cleartalk
1600 Ute Ave.
Grand Junction, CO 81501

Dan Menser, Esq.
Marin Fettman, Esq.
c/o T Mobile USA, Inc.
12920 SE 38th St.
Bellevue, WA 98006

Mark J. Ashby
Cingular Wireless
5565 Glennridge Connector
Suite 1700
Atlanta, GA 30342

ATTACHMENT A

To The Coalition's Responses' to the CMRS Providers' First Set of Interrogatories

A. Ardmore Telephone Company, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

Wire Center	CLLI
Ardmore, AL	ARMRALXADSO
Minor Hill, TN	MNHLTNXARS5
McBurg, TN	MCBGTNXARS5

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intralata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: The Company does not have an affiliate that provides toll.

B. Ben Lomand Rural Telephone Cooperative, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

Exchange	Wire Center	CLLI
<u>Exchange</u>	<u>Wire Center</u>	<u>CLLI</u>
931-394	Beech Grove	BCGVTNXA
467	Pelham	PLHMTNXA
592	Tracy City	TRCYTNXB
931-596	Hillsboro	HLBOTNXA
635	Viola	VIOLTNXA
657	Doyle	DOYLTNXA
668,815	McMinnville	MMRLTNXA
686	Rock Island	RCISTNXA
692	Beersheba	BRSHTNXA
738,739	Sparta	SPRLTNXA
761	Old Zion	OLZITNXA
779	Laager	LAGRTNXA
924	Monteagle	MTEGTNXA

934	Dibrell	DBRLTNXA
935	Bondecroft	DRSTTNXA
939	Centertown	CNTWTNXA
946	Spencer	SPNCTNXA

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: Yes, subtended by Ben Lomand Communications, Inc.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, Ben Lomand Communications, Inc.

C. Bledsoe Telephone Cooperative

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

Switch	Wire Center	CLLI code
DMS 10	Pikeville	PKVLTNXA
DMS 10	Nine Mile	NNMLTNXA
DMS 10	Fall Creek Falls	FCFLT NXA
DMS 10	College Station	CLSTTNXA
DMS 10	Dunlap	DNLPTNXA

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: No other company subtends the Company's tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intralata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, Bledsoe Telephone Cooperative Long Distance.

D. CenturyTel of Adamsville, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: Yes. Sprint Spectrum, TRA Docket No. 00-01032.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: None.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

**ADVLTNXADS1 – Adamsville
MDVLTNXADS0 - Milledgeville
SHLHTNXADS0 - Shiloh**

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, CenturyTel Long Distance

E. CenturyTel of Claiborne, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: Sprint Spectrum – TRA Docket No. 00-01032; Tennessee RSA No. 3 – TRA Docket No. 02-00328.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: None.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

**NWTZTNXADS1 – New Tazewell
SHCPTNXARS5 – Sharps Chapel**

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35 Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, CenturyTel Long Distance.

F. CenturyTel of Ooltewah-Collegedale, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: Sprint Spectrum – TRA Docket No. 00-01032.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: None.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

APSNTNXARS5 – Apison
CLDLTNXARS5 – Collegedale
OLTWTNXADS1 - Ooltewah

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, CenturyTel Long Distance.

G Concord Telephone Exchange, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1:

**US LEC
XO Communications
New South
Knology
US Cellular**

**TRA Docket No. 03-00415
TRA Docket No. 03-00568
TRA Docket No. 04-00081
To Be Filed
(Copy sent separately)**

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: US Cellular.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

CONCORD

CNCRTNXADS2

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, TDS Long Distance Corporation.

H. Crockett Telephone Company, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

Crockett ALAMTNXADS1

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, CommuniGroup and EXCEL (VarTEC)

I. Dekalb Telephone Cooperative, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable. The Company has an affiliate, Advantage Cellular Systems with which it has certain affiliated transactions and shares facilities under common control and ownership. These affiliated transactions are confidential and not subject to discovery because the company is a telephone cooperative.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

Smithville SMVLTNXADS1

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes - DTC Long Distance.

J. Highland Telephone Cooperative, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: Eloqui, filed with the TRA.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Eloqui by virtue of a minority interest.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

<u>EXCH</u>	<u>CLLI</u>	<u>ST</u>	<u>EXC</u>
Deer Lodge	DRLDTNXARSO	TN	965
Huntsville	HNVLTNXARSO	TN	663/319
Oakdale	OKDLTNXARSO	TN	369
ONEIDA	ONEDTNXADSO	TN	569/286
PETROS	PTRSTNXSRSO	TN	324
ROBBINS	RBNSTNXARSO	TN	627
SUNBRIGHT	SNBRTNXARSO	TN	628
WARTBURG	WABGTNXARSO	TN	346
PINE KNOT	PNKNKYXARSO	KY	354
STEARNS	STRNKYXARSO	KY	376

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intralata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes – Highland Communications Corp.

K. Humphreys County Telephone Company

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1:

**US LEC
XO Communications
New South
Knology**

**TRA Docket No. 03-00415
TRA Docket No. 03-00568
TRA Docket No. 04-00081
To Be Filed**

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

NEW JOHNSONVILLE

NWJHTNXARS5

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, TDS Long Distance Corporation.

L. Loretto Telephone Company, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

<u>EXCHANGE</u>	<u>LOCATION</u>	<u>CLLI</u>
LORETTO	136 S MAIN, LORETTO , TN	
	TOLL TANDEM CLASS 5 END OFFICE	LRTTTNXA94T LRTTTNXADSO
LEOMA	2596 HWY 43 S LEOMA, TN.	LEOMTNXARS5
ST JOSEPH	305 N. MAIN ST.JOSEPH,TN	STJSTNXARS5
FIVE POINTS	858 RABBIT TRAIL FIVE POINTS, TN	FVPLTNXARS5
ETHRIDGE	24 MAIN ST. ETHERIDGE, TN	ETRGTNXADSO

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: See Response, I-31. No other company subtends Loretto.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: The Company does not have an affiliate toll provider.

M. Millington Telephone Company, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

SWC	Wire Center	CLLI
Mason	Mason	MASNTNXARS5
Stanton	Stanton	SNTNTNXARS5
Rosemark	Rosemark	RSMRTNXARS5
Drummonds	Drummonds	DRMNTNXARS5
Munford	Munford	MNFDTNXARS5
Millington	Millington	MGTNTNXADS0
Shelby Forest	Shelby Forest	SHFRTNXARS5

I-34 Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: See Response, I-31.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intralata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes. Mtel Long Distance.

N. North Central Telephone Cooperative, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

Switch Type	Wire Center Location	CLLI Code	NPA	NXX
Remote	Westmoreland	WMLDTNXARS5	615	644
Remote	Green Grove	GNGVTNXARS5	615	655
Remote	Hillsdale	HLDLTNXARS5	615	633
Host	Lafayette	LFYTTNXADS1	615	666/688
	Pleasant			
Remote	Shade	PLSHTNXARS5	615	677
	Red Boiling			
Remote	Springs	RBSPTNXARS5	615	699
Remote	Defeated	DFTDTNXARS5	615	774
Remote	Bethpage	BTHPTNXARS5	615	841
Remote	Oak Grove	OKGVTNXADS0	615	888

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: See Response, I-31. No other carrier subtends the North Central tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intralata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: North Central does not wholly own or have a controlling interest in a toll provider. It is an affiliate of Bluegrass Telecom by virtue of its minority ownership interest.

O. Peoples Telephone Company

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

Peoples ERINTNXADS2

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: CommuniGroup and EXCEL (VarTEC).

P. Tellico Telephone Company, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1:

**US LEC
XO Communications
New South
Knology
US Cellular**

**TRA Docket No. 03-00415
TRA Docket No. 03-00568
TRA Docket No. 04-00081
To Be Filed
(Copy sent separately)**

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: US Cellular.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

TELLICO PLAINS	TLPLTNXADS1
BALL PLAY	BLPLTNXARS0
COKER CREEK	CKCKTNXARS0
ENGLEWOOD	ENWDTNXADS1
NIOTA	NIOTTNXARS0
RICEVILLE	RCVLTNXARS0
VONORE	VONRTNXADS1

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, TDS Long Distance Corporation.

Q. Tennessee Telephone Company

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1:

**US LEC
XO Communications
New South
Knology**

**TRA Docket No. 03-00415
TRA Docket No. 03-00568
TRA Docket No. 04-00081
To Be Filed**

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

LAVERGNE

LVRGTNXADS2

MT. JULIET

MTJLTNXADS2

CORNERVILLE

COVLTNXARS0

WAYNESBORO

WYBOTNXADS1

CLIFTON

CFTNTNXARS0

COLLINWOOD

CNWDTNXADS1

DARDEN

DRDNTNAARL0

LINDEN	LNDNTNXARS0
LOBELVILLE	LBVLTNXARS0
PARSONS	PRSSTNXADS1
BRUCETON	BCTNTNXARS0
DECATURVILLE	DCVLTNXARS0
SARDIS	SRDSTNXARS1
SCOTTSHILL	SCHLTNXARS0
HALLS CROSSROADS	HCRDTNXADS1

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35 Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, TDS Long Distance Corporation.

R. Twin Lakes Telephone Cooperative Corporation

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

**GAINESBORO TENNESSEE CILLI CODE GNBOTNXADS0
GAINESBORO TENNESSEE CILLI CODE GNBOTNXA99T
BYRDSTOWN TENNESSEE CILLI CODE BYTWTNXARS0
CELINA TENNESSEE CILLI CODE CELNTNXADS0
CHESTNUT MOUND TENNESSEE CILLI CODE CHMNTNXARS0
CLARKRANGE TENNESSEE CILLI CODE CLRKTNXARS0
CRAWFORD TENNESSEE CILLI CODE CRFRTNXARS0
GRANVILLE TENNESSEE CILLI CODE GRVITNXARS0
MOSS TENNESSEE CILLI CODE MOSSTNXADS0
NORTH SPRING TENNESSEE CILLI CODE NRSPTNXARS0
RICKMAN TENNESSEE CILLI CODE RKMNTNXARS0
BAXTER TENNESSEE CILL CODE BXTRTNXADS0
COOKEVILLE SOUTH TENNESSEE CILLI CODE CKVLTNXBDS0
LIVINGSTON TENNESSEE CILL CODE LVTNTNXADS1
LIVINGSTON TENNESSEE CILLI CODE LVTNTNXADS0
JAMESTOWN TENNESSEE CILLI CODE JMTWTNXADS1
HIGHLAND TENNESSEE CILLI CODE HGLDTNXARS0**

I-34 Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: None.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, Twin Lake Communication.

S. United Telephone Company

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

<u>Location</u>	<u>CLLI Code</u>	<u>NXX</u>
Chapel Hill	CPHLTNXADS2	364, 276, 368
Nolensville	NLVLTNXARS1	776, 941
Unionville	UNVLTNXARS0	294,437,233,695
Estill Springs	ESSPTNXARSO	649

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes - UTC Long Distance.

T. West Tennessee Telephone Company, Inc.

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31:

West Tennessee BRFRTNXADS2

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers

Response I-34: The Company does not operate a tandem.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: CommuniGroup and EXCEL (VarTEC)

U. Yorkville Telephone Cooperative

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

Response I-1: None.

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

Response I-5: Not Applicable.

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

Response I-31: The Company's landline exchange is served by a Mitel switch.

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

Response I-34: The company does not have a tandem switch.

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

Response I-35: Yes, Yorkville Communications, Inc.